SOUTHERN DISTRICT OF NEW YORK	x	
In re	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	: :	08-13555 (JMP)
Debtors.	:	(Jointly Administered)
	: x	

SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE STATEMENT OF ROBERT C. ZINNERSHINE,

ON BEHALF OF SEYFARTH SHAW LLP

COMMONWEALTH OF MASSACHUSETTS)
) ss
COUNTY OF SUFFOLK)

Robert C. Zinnershine, being duly sworn, upon his oath, deposes and says:

- I am a partner of Seyfarth Shaw LLP, located at Two Seaport Lane, Suite
 300, Boston, Massachusetts 02210 (the "Firm").
- 2. The Firm was previously appointed as "ordinary course counsel" to Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors in the above-referenced chapter 11 cases (together, the "<u>Debtors</u>" and, collectively with their non-debtor affiliates, "<u>Lehman</u>"), to provide legal services to the Debtors, including representation of the Debtors as lenders in connection with mortgage loan workouts, foreclosures and related litigation (collectively, the "Loan Transactions").
- 3. In connection with the Firm's appointment as ordinary course counsel as provided above, I signed an Affidavit and Disclosure Statement dated January 20, 2010 (the

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"Original Affidavit") which was filed with the Court. This Supplemental Affidavit and Disclosure Statement is filed with the Court to supplement the disclosures made in the Original Affidavit.

- 4. The Firm has been retained by FundCore Finance Group, LLC ("FC") to represent it as a lender in connection with a loan to Carlyle Place Apartments L.P. (the "Carlyle Partnership"), a Delaware limited partnership, in the approximate amount of \$10,000,000 to be secured by a first mortgage on an apartment building located at 711 West Bay Area Blvd., Webster, Texas. The Carlyle Partnership has advised the Firm that it is an indirect, partially owned subsidiary of LBHI. Specifically, it is the Firm's understanding that LBHI owns 100% of Lehman ALI, which owns 99.75% of Pami Inc., which owns 100% of Pami LLC, which owns 100% of LB Carlyle, LLC, a Delaware limited liability company, which owns 70% of the partnership interests in the Carlyle Partnership and is also one of two general partners of the Carlyle Partnership.
- 5. The Firm's representation of FC is not adverse to the Debtor or the estate with respect to the matters for which the Firm has been retained by the Debtor.

y: 100 //C

Subscribed and sworn to before me this 14th day of May, 2010

Notary Public

